



Universal Corporation Human Rights Policy

Introduction and Policy Statement

Universal is committed to business practices that respect the human rights of our employees, parties in our supply chain and their communities. The UN Guiding Principles on Business and Human Rights (the “UN Guiding Principles”) and the International Labor Organization Declaration on Fundamental Principles and Rights at Work (the “ILO Fundamental Principles”) provide the framework for internationally recognized human rights. Universal’s policy is to operate in a manner and perform human rights due diligence consistent with the UN Guiding Principles and the ILO Fundamental Principles in order to identify and assess actual and potential human rights impacts in our operations and supply chain, and to reinforce, adjust or adopt programs and practices as required to prevent, mitigate and remediate such human rights impacts. Such programs and practices include without limitation our Code of Conduct, our Anti-Corruption Compliance Manual, and our Agricultural Labor Practices Code.

Governance and Scope of this Policy

This Policy is approved by our Board of Directors and overseen by our Board of Directors through our Nominating and Corporate Governance Committee, together with our Chief Executive Officer and other members of management. It applies to each officer, director and employee at Universal Corporation or any of its subsidiaries, each of whom is charged with ensuring that his or her activities and those of their fellow officers, directors and employees uphold basic human rights. We also expect our suppliers and other supply chain partners to operate following the principles of this Policy to protect internationally recognized human rights.

Human Rights Assessment

In accordance with this Policy, we commit on an ongoing basis and with consideration of the interests of our stakeholders to identify, assess, prevent and remediate any actual or potential human rights impacts occurring directly or indirectly through our operational footprint and supply chain. In connection with this commitment we have prioritized the following human rights topics:

- **Child Labor:** Universal is committed to eliminating child labor. Children are vulnerable to exploitation and frequently are unable to defend themselves. Child labor also frequently interferes with school attendance, which infringes upon a child’s right to education. Universal prohibits the employment of child labor and we will monitor and work with parties in our supply chain to counter child labor and its root causes.

- **Forced Labor:** Universal believes that everyone has the right to their choice of employment, to decent working conditions, to move freely, and to enjoy leisure days. Universal does not tolerate any forced labor in its organization and expects the same from suppliers and others in our supply chain. Universal undertakes risk assessments and facilitates reporting mechanisms to identify the risk of forced labor, including involuntary or trafficked labor in its supply chain, and implements measures to avoid, address, mitigate and eliminate any such risk and its root causes.
- **Safe Work Environment:** Health and Safety is of paramount importance to Universal. The resources and investments needed for the protection of our employees are a critical part of our business, and we work continually to improve our working environment and build upon our safety practices. We also expect our suppliers to provide a safe working environment to their own workers. Where suppliers require support, we work to facilitate access to protective equipment, clean water, medical help and safe accommodation.
- **Fair and Equal Treatment:** Universal believes in maintaining a diverse and inclusive workforce by promoting employment equality. Universal believes in making personnel decisions based upon the merits without regard to, or discrimination on the basis of, race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. We hire locally within every region we operate and contribute to employee well-being with appropriate programs. Universal also extends this policy to our suppliers and monitors treatment of their work force. We believe that all people are entitled to be treated with dignity and respect, and we do not discriminate or allow behavior that is abusive or demeaning. If unfair treatment is found, the root cause must be identified and practices put in place to ensure it is addressed.
- **Freedom of Association:** Universal believes in the right of workers to organize and collectively bargain. Universal believes in constructive and transparent discussions between employers and workers, and welcomes associations that promote fair working conditions and facilitate better communication without fear of retaliation.
- **Compliance with and Protection of the Law:** Universal believes in complying with and upholding the applicable laws of the locations in which we operate. To the extent applicable law is more stringent than this Policy, we must comply with applicable law. We believe in the due process of the law and follow local legislation in any employment or discipline process. Universal also believes in upholding data privacy laws regarding employees and suppliers by diligently applying requirements and data transfer agreements. Universal also extends this policy to suppliers and monitors their treatment of employees to ensure that all local laws are followed in supplier business practices.

Addressing Concerns

We strive to prevent any human rights impacts in our operations and supply chain. To the extent any such impacts are identified, we are committed to remediating them. Any human rights concerns or grievances in our operations or supply chain should be reported to a locally recognized grievance mechanism. We

are committed to improving access to such mechanisms for all our operations and supply chains. We are also committed to building awareness among our officers, directors and employees and the parties in our supply chain about reporting human rights concerns. Universal will not tolerate any retaliation against persons making good faith reports of human rights concerns or grievances.

Going Forward

Human rights due diligence is an ongoing process. As we continue our efforts to uphold this Policy, we will address any additional focus areas that emerge, assess any changes in our business activities or operating environments and work with other relevant stakeholders to create awareness and effect change. As a global company, our local teams will develop and maintain local policies and programs suitable for the local operating environment, commit organizational resources, educate and train our workforce and third parties in our supply chain to adhere to this Policy, our corresponding programs and practices, and applicable laws. This Policy will be regularly reviewed by the Universal Corporation Nominating and Corporate Governance Committee and will be amended as needed.